

NICHOLAS A. TRUTANICH  
United States Attorney  
DEBORAH LEE STACHEL  
Regional Chief Counsel, Region IX  
Social Security Administration  
MICHAEL K. MARRIOTT, CSBN 280890  
Special Assistant United States Attorney  
160 Spear Street, Suite 800  
San Francisco, California 94105  
Telephone: (415) 977-8985  
Facsimile: (415) 744-0134  
E-Mail: [Michael.Marriott@ssa.gov](mailto:Michael.Marriott@ssa.gov)

Attorneys for Defendant

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA  
LAS VEGAS DIVISION**

COLUMBINE DEVINCENT BATALONA,	)	Case No: 2:18-cv-02309-JAD-VCF
	)	
Plaintiff	)	
	)	
v.	)	<b>STIPULATION FOR EXTENSION OF</b>
	)	<b>TIME TO FILE DEFENDANT'S CROSS</b>
	)	<b>MOTION TO AFFIRM</b>
NANCY A. BERRYHILL, Acting	)	
Commissioner of Social Security,	)	<b>(Second Request)</b>
	)	
Defendant.	)	
	)	

Defendant Nancy A. Berryhill, Acting Commissioner of Social Security, hereby requests an extension of time of fifteen days to Monday, July 15, 2019, to prepare and file her cross motion to affirm. This is the Commissioner's first request for an extension.

Defendant respectfully requests this extension of time because of a very heavy workload, and because of upcoming leave planned around the Fourth of July federal holiday.

1 On June 28, 2019, Plaintiff's counsel informed Defendant by email that he had no  
2 objection to this extension.

3  
4 Respectfully submitted,

5 Date: July 1, 2019

LAW OFFICES OF LAWRENCE D. ROHLFING

6 By: /s/ Cyrus Safa\*

7 CYRUS SAFA

8 \*authorized by email June 28, 2019

9 Attorney for Plaintiff

10 Date: July 1, 2019

NICHOLAS A. TRUTANICH

11 United States Attorney

12 By: /s/ Michael K. Marriott

13 MICHAEL K. MARRIOTT

14 Assistant Regional Counsel

15 Attorneys for Defendant

16 Of Counsel

Jeffrey Chen

17 Assistant Regional Counsel

Social Security Administration

18  
19  
20 IT IS SO ORDERED.

21  
22 7-1-2019

DATE: \_\_\_\_\_



23 HONORABLE CAM FERENBACH

24 United States Magistrate Judge

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

**CERTIFICATE OF SERVICE**

I, Michael K. Marriott, hereby certify that I caused a copy of Stipulation for Extension of Time to File Defendant's Cross Motion to Affirm to be served, via CM/ECF notification, on:

Cyrus Safa  
Law Offices of Lawrence D. Rohlfing  
12631 E. Imperial Highway, Suite C-115  
Santa Fe Springs, CA 90670

Date: July 1, 2019

NICHOLAS A. TRUTANICH  
United States Attorney

By: /s/ Michael K. Marriott  
MICHAEL K. MARRIOTT  
Assistant Regional Counsel

Attorneys for Defendant